

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA

IN THE MATTER OF FEDERAL SEARCH
WARRANT TO SEARCH CHIME
FINANCIAL, INC. FOR ALL RECORDS
ASSOCIATED WITH CHIME FINANCIAL,
INC. CREDIT/DEBIT CARD, FIRST SIX
NUMBERS 498503 AND LAST FOUR
NUMBERS 0143

Case No.

1:21mj 86

Filed Under Seal

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Deputy United States Marshal W. Fred Frederick, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant under Federal Rule of Criminal Procedure 41 and 18 U.S.C. § 2703(c)(1)(A) for information about the Chime Financial, Inc. credit/debit Card with first six digits 498503 and last four digits 0143, issued by Chime Financial, Inc., headquartered at 77 Maiden Lane San Francisco, CA 94108. The target credit/debit card is described herein, and the location information to be seized is described herein and in the application for search warrant.

2. I have been employed by the United States Marshal Service (USMS) as a Deputy United States Marshal (DUSM) since December 10, 2009. I am a graduate of the USMS Training Academy and the Criminal Investigator Training Program at the Federal Law-Enforcement Training Academy in Glynnco, GA. My duties as a DUSM assigned to the Northern District of West Virginia include investigating, locating and apprehending state and federal fugitives wanted for violations of state and federal law. I completed the USMS Sex-Offender Investigations Coordinator Training Program on July 24, 2015 and I am currently assigned as the

District Sex-Offender Investigations Coordinator for the USMS in the Northern District of West Virginia.

3. Prior to being employed as a DUSM, I was employed as a Deputy Sheriff at the Marion County Sheriff's Department in West Virginia from February 1, 2000 through December 4, 2009. I am a graduate of the West Virginia State Police Academy and have also completed advanced training in criminal investigations that include Narcotics Investigations, Undercover Drug Investigations, Homicide Investigations, Clandestine Laboratory Investigations, Crime Scene Investigations, Forensic Evidence Collection and Latent Fingerprint Recovery and Drug Diversion.

4. As a Deputy Sheriff, I was assigned as a detective with the Three River's Drug and Violent Crimes Taskforce for over six years and have investigated countless cases involving drug use and distribution and violent crimes. I was also assigned to the USMS's Mountain State Fugitive Taskforce as a Taskforce Officer from May 4, 2007 until leaving the Sheriff's Department to become a DUSM.

5. As a Deputy U.S. Marshal and as a Deputy Sheriff, I have obtained and executed search warrants, arrest warrants, and other court orders and provided testimony in both state and federal courts.

6. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all my knowledge about this matter.

7. Based on the facts set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 2250 have been committed, are being committed and/or, will be

committed by Jason Lewis BELL. There is also probable cause to believe that the financial transactions and information being sought will constitute evidence of these criminal violations.

8. Based on the facts set forth in this affidavit, there is probable cause to believe that Jason Lewis BELL has violated 18 U.S.C. § 2250. Jason Lewis BELL is the subject of federal investigation in relation to this crime. There is also probable cause to believe that Jason Lewis BELL was aware of these charges and has since fled. There is also probable cause to believe that the information sought will assist law enforcement in corroborating the elements of the crime in this criminal investigation. Specifically, the data received will verify Jason Lewis BELL's location throughout the time span of the criminal conduct.

9. The court has jurisdiction to issue the proposed warrant because it is a "court of competent jurisdiction" as defined in 18 U.S.C. § 2711. Specifically, the Court is the United States District Court for the Northern District of West Virginia, a district court of the United States that has jurisdiction over the offense being investigated. See 18 U.S.C. § 2711(3)(A)(i).

PROBABLE CAUSE

10. The United States, including the USMS, is conducting a criminal investigation of Jason Lewis BELL, regarding possible violations of Title 18 U.S.C. § 2250.

11. Jason Lewis BELL was convicted of Lewd and Lascivious Behavior/Molestation in Clay County, Florida on 07-24-2007. The victim in this case was a child under the age of sixteen. Based on this conviction, BELL has a lifetime requirement to register as a sex-offender in the State of Florida and the State of West Virginia.

12. Jason Lewis BELL had last registered as a sex-offender in the State of Florida on 12-30-2019 and signed a Florida State FDLE Sexual Predator/Offender Registration Form at the Jacksonville Sheriff's Office. On 02-05-2020, BELL signed a State of Florida FDLE Sexual

Predator/Offender Transient Check-In Form. Both forms notify BELL of his requirement to register as a sex-offender.

13. On May 6, 2021, DSOC/DUSM Frederick received a collateral lead from DSOC/DUSM Tippie, M/FL, regarding Jason Lewis BELL. DUSM Tippie advised DUSM Frederick that BELL had last registered as a sex-offender in the State of Florida on December 30, 2019. BELL was wanted by local law-enforcement in the State of Florida and an arrest warrant had been issued. DUSM Tippie's investigations revealed that BELL had resided in Fairmont, WV from around November 2020 until February 2021, when he returned to Florida. BELL had been associated with a female identified as Anna FROCK in West Virginia.

14. DUSM Frederick contacted the WV State Police Sex-Offender Registry and confirmed that there was no record of Jason Lewis BELL having ever registered as a sex-offender in the State of West Virginia. DUSM Frederick opened an investigation on Jason Lewis BELL for possible violations of 18 U.S.C. §2250, the Sex Offender Registration Notification Act.

15. On May 25, 2021, DUSM Frederick interviewed Anna Frock, who confirmed that she had been in a romantic relationship with Jason Lewis BELL from around November 2020 until February 2021. Frock had met BELL online, and BELL had used an alias, "Jay BOYER," when introducing himself to Frock. DUSM Frederick showed Frock a photograph of Jason Lewis BELL and she positively identified him as the male she knew as "Jay BOYER." Frock stated that BELL had been living in a house trailer in the Camelot Mobile Home Park in Fairmont, WV throughout this time. DUSM Frederick interviewed other witnesses, including the owner of the mobile home, Billie Joel Hood, who corroborated that BELL had lived at his residence, Lot# 14, Camelot Mobile Home Park, Fairmont, WV, during this time.

16. Anna Frock provided DUSM Frederick with Jason Lewis BELL's cellphone number, 904-506-3532. DUSM Frederick observed this same cellphone number in Frock's cellphone contacts under the name "Jay BOYER."

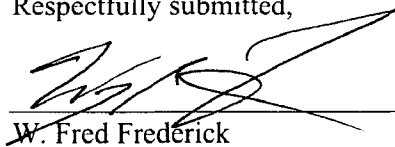
17. DUSM Frederick received records from Greyhound Bus dated February 13, 2021 which shows that Jason BELL purchased a bus ticket to travel from Fairmont, WV to Jacksonville, FL for \$130.99 utilizing a credit/debit card issued by Chime Financial, Inc., with first six digits 498503 and last four digits 0143.

18. By obtaining subscriber and transactional records from CHIME Financial, Inc, law-enforcement will be able to determine if Jason Lewis BELL's credit/debit was in the Fairmont, WV area from October 2020 through May 2021, which would further corroborate that BELL was living in the State of West Virginia as an unregistered sex-offender, in violation of 18 U.S.C. § 2250.

AUTHORIZATION REQUEST

19. Based on the foregoing, I request that the Court issue the proposed search warrant, pursuant to Federal Rule of Criminal Procedure 41 and 18 U.S.C. § 2703(c).

Respectfully submitted,



W. Fred Frederick
Deputy United States Marshal
United States Marshals Service

Subscribed and sworn to before me on September 1, 2021 By phone



UNITED STATES MAGISTRATE JUDGE
MICHAEL JOHN ALOI